

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JAMES EVERETT SHELTON,	:	
	:	
Plaintiff,	:	Case No. 2:21-cv-03045-JMY
	:	
	:	
v.	:	
	:	
LUMICO LIFE INSURANCE CO.,:	:	
and ASSURANCE IQ, LLC,	:	
	:	
Defendants.	:	

**JOINT STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFF’S FIRST
AMENDED COMPLAINT**

Plaintiff James Everett Shelton, (“Plaintiff”) and Defendants Lumico Life Insurance Co. (“Lumico”) and Assurance IQ, LLC (“Assurance”) through their respective counsel, stipulate and agree, pursuant to Rule 7.4 of the Rules of Civil Procedure of the United States District Court for the Eastern District of Pennsylvania, and subject to the Court’s approval, that Defendants Assurance and Lumico will answer, move, or otherwise respond to the First Amended Complaint by October 13, 2021.

In further support of this Stipulation, the Parties state as follows:

WHEREAS, Plaintiff James Everett Shelton filed his First Amended Complaint on September 15, 2021, (ECF No. 45);

WHEREAS, the deadline for Defendants Lumico and Assurance to respond to Plaintiff’s First Amended Complaint is currently September 29, 2021;

WHEREAS, Defendants respectfully request additional time to more fully investigate the claims raised in the First Amended Complaint;

WHEREAS, this request for an extension is made in good faith and is not interposed for

purposes of delay;

WHEREFORE, Plaintiff, and Defendants Lumico and Assurance, through their respective undersigned attorneys, hereby STIPULATE and AGREE that the time for Defendants Lumico and Assurance to answer, move, or otherwise respond to the First Amended Complaint shall be extended to October 13, 2021.

Respectfully submitted,

Date: September 28, 2021

***For Plaintiff, James Everett
Shelton***

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2021, a true copy of the foregoing document was served on all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Daniel E. Brewer

Daniel E. Brewer